

Proof of Claim

Case No. 18-23538 (RDD)

Lorraine Majeski - Reference number 223, Affected Proof Claim Number 19385; 19391

February 23, 2021

This response is in regard to Case No. 18-23538 (RDD), filed in the United States Bankruptcy Court Southern District of New York, against Sears Holdings Corporation and certain of its affiliates, collectively "Debtors", in the above-referenced chapter 11 cases. This response is my formal opposition to the proposed disallowance and expungement of Claim(s), as listed in Exhibit A in the Notice of Hearing on Debtors' Twenty-Third Omnibus Objection to Proof of Claims, filed on 02/09/2021 ("the Objection").

Name of Claimant and Basis of the Claim

I, Lorraine Majeski (Reference number 223, Affected Proof Claim Number 19385; 19391* in Exhibit A of the Objection), worked for Sears Roebuck & Co. as National Retail and Catalog Buyer for Girls and Boys Apparel from 1971 to 1990. In 2014, I became aware of my Sears Supplemental Retirement Past Service Plan (the "Benefit") earned during my previous employment with the company as an executive only after making an unsolicited call to Sears to inquire about my future pension plan benefits. To the best of my recollection, I was informed my Benefit was worth \$9,938 at that time. I was also advised that this Benefit was only available to me at time of initiating my full retirement benefits. As of February 23, 2021, I have not yet retired, and do not plan to initiate my retirement pension for another two years.

Exhibit A in the Objection reflects a total asserted claim in the amount of \$19,876.00. Exhibit A is verified proof that my claim is documented on the Debtors' books and records. Debtor's Objection does not refute my Proof of Claim, but says it should be barred because it was filed on May 7, 2019, after the Bar Date of April 10, 2019.

Factual and Legal Basis for Opposing the Objection

The Due Process Clause of the Fifth Amendment dictates that a debtor's creditors receive notice of the debtor's bankruptcy case and applicable bar date so that creditors have an opportunity to make any claims they may have against the debtor. *In re XO Commc'ns Inc.*, 301 B.R. 782, 793 (Bankr. S.D.N.Y. 2003) (citing *In re Drexel Burnham Lambert Group Inc.*, 151 B.R. 674, 679 (Bankr.S.D.N.Y.1993)). If a creditor is "known" to a debtor, actual notice of a debtor's bankruptcy filing and bar date must be given to the creditor in order to achieve a legally effective discharge of the creditor's claim. *In re XO Commc'ns Inc.* (citing *Chemtron*, 72 F.3d at 346).

My objection is predicated upon Debtor's, and third-party service provider Prime Clerk's, complete failure to notify me, a known creditor, in any form, of the necessity to file a Proof of Claim against the Debtors, nor of the deadline to do so. Prime Clerk verbally confirmed to me on

February 19, 2021 that they have no record or confirmation of ever sending me notice of the need to file a Proof of Claim by the Bar Date. More specifically, Prime Clerk indicated that there is no record of me being on the mailing list provided by Sears for purposes of notifying creditors of the Bar Date.

I only found out about this issue when I received a letter from PBCG (Pension Benefit Guarantee Corporation), simply dated "April 2019" (no day included on said letter), which indicated the following:

Sears Holdings Corporation recently notified participants in Sears Holdings Pension Plan 1 and Plan 2 (the "Plans") of its intent to terminate the Plans with a Date of Plan Termination of March 31, 2019.

We are writing to you now, because since that time, the Pension Benefit Guarantee Corporation (PBCG), a U.S. Government agency, and the Sears Holdings Corporation have agreed to terminate the plans with a Date of Plan Termination of January 31, 2019.

However, Sears Holdings Pension Plan participants should continue to contact the Sears Holdings Pension Center for information about benefits or to begin the retirement process.

Upset and concerned as to how I could receive a notice in April 2019 stating my earned Benefits pursuant to Debtor's supplemental benefits plan had been terminated three months prior (effective as of January 2019), I called the Sears Pension Center as instructed in the note. From there I was directed to Prime Clerk. Via telephone call, Prime Clerk informed me that there had been an April 10, 2019 filing deadline for claims against the Debtor. So not only was the April 2019 letter from PBGC (i) received three months after the plan benefits were terminated and (ii) the only notice I received discussing the plan termination to that point, but it was also (iii) mailed to me the same month that there was an alleged filing deadline for my claim of benefits against Debtor.

Prime Clerk advised me they would nevertheless accept my claim against the Debtor, and that there was an extended filing deadline of 5/16/2019 at 4PM. I accordingly filed my Proof of Claim filed on May 7, 2019 shortly after this discussion with Prime Clerk (see attached Proof of Claim with time stamp).

In no way can this chain of events be viewed as providing me, a known creditor of the Debtor, with proper or timely notice of the Bar Date as is required under the laws of the United States Bankruptcy Court Southern District of New York, because I received no notice whatsoever. I am a known creditor of Debtors as evidenced by the reference and specific claim amount delineated in Exhibit A of the Objection, and therefore required actual notice of Debtor's bankruptcy filing and the Bar Date so I could properly assert my claim of earned Benefits against the Debtor.

Upon becoming aware of the Bar Date from Prime Clerk, I took immediate and reasonable action to file my Proof of Claim. My proof of claim was accepted by Prime Clerk (see attached Proof of Claim with time stamp), and I was told by Prime Clerk that they are even continuing to accept claims in this case as of February 19, 2021.

Further, subsection 2 of the Claims Hearing Procedure, as set forth in the Objection, states that:

The Bankruptcy Court may enter an order at the scheduled hearing sustaining an objection to proofs of claim (each, a “Proof of Claim”) with respect to which no response (a “Response”) is properly filed and served.

Based upon the fact that no notice was provided to me, the power delineated to the court in this case dictates that my Proof of Claim should not be barred.

Lastly, I feel it should be noted that Dominic A. Litz of Weil, Gotshal & Manges LLP, counsel for Debtors, has provided me with certain information that appears to be inaccurate based on conversations I have thereafter had with both Prime Clerk, as well as the Clerk’s Office with the White Plains Office for the United States Bankruptcy Court of the Southern District of New York. I called Mr. Litz on 2/22/2021 to advise him Prime Clerk confirmed they had not record of mailing me the Bar Date Notice. He told me I did not need to file with the court by March 3, 2021, and that he would personally extend the deadline for me until March 16, 2021 while he investigated this matter. I felt I should disclose this information. See enclosed Exhibit 2.

Documentation or other evidence of the Claim, Provided Herewith

Attached are the following:

- Exhibit 1 – Copy of Proof of Claim, accepted by Prime Clerk which includes date and time stamp.
- Exhibit 2 – Record of conversations with Dominic A. Litz of Weil, Gotshal & Manges LLP.

Address for All Future Mailings

My current mailing address now and since 2014:

Lorraine Majeski
424 Westwood Ave
Long Branch, NJ 07740
(732) 759-4208
Lmusworth@aol.com

Upon becoming aware of the Bar Date from Prime Clerk, I took immediate and reasonable action to file my Proof of Claim. My proof of claim was accepted by Prime Clerk (see attached Proof of Claim with time stamp), and I was told by Prime Clerk that they are even continuing to accept claims in this case as of February 19, 2021.

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Lastly, I feel it should be noted that Dominic A. Litz of Weil, Gotshal & Manges LLP, counsel for Debtors, has provided me with certain information that appears to be inaccurate based on conversations I have thereafter had with both Prime Clerk, as well as the Clerk's Office with the White Plains Office for the United States Bankruptcy Court of the Southern District of New York. I called Mr. Litz on 2/22/2021 to advise him Prime Clerk confirmed they had not record of mailing me the Bar Date Notice. He told me I did not need to file with the court by March 3, 2021, and that he would personally extend the deadline for me until March 16, 2021 while he investigated this matter. I felt I should disclose this information. See enclosed Exhibit 2.

Documentation or other evidence of the Claim, Provided Herewith

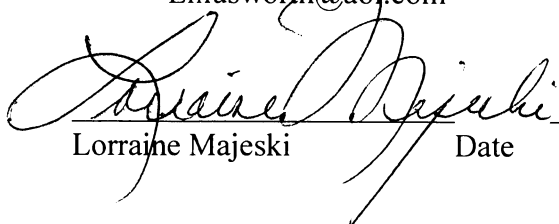
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Address for All Future Mailings

My current mailing address now and since 2014:

Lorraine Majeski
424 Westwood Ave
Long Branch, NJ 07740
(732) 759-4208
Lmusworth@aol.com

 2/24/2021
Lorraine Majeski Date



Begin forwarded message:

From: Prime Clerk <echosign@echosign.com>
Date: May 7, 2019 at 8:20:01 AM EDT
To: Sears Claims <searsclaims@primeclerk.com>, Iorraine MAJESKI <jrmusworth@aol.com>
Subject: Electronic Proof of Claim between Prime Clerk and Iorraine MAJESKI is Signed and Filed!
Reply-To: Sears Claims <searsclaims@primeclerk.com>

[illegible][illegible]

From: Sears Claims (Prime Clerk)
To: Sears Claims and Iorraine MAJESKI

Copies have been automatically sent to all parties to the agreement.

You can view the document in your Adobe Sign account.

Why use Adobe Sign:

- Exchange, Sign, and File Any Document. In Seconds!
- Set-up Reminders. Instantly Share Copies with Others.
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Thank you for your electronic submission. Please do not send a duplicate of this submission by any other method of return.

To ensure that you continue receiving our emails, please add echosign@echosign.com to your address book or safe list.



Electronic Proof
of Clai...ed.pdf

Modified Form 410

Instructions for Proof of Claim

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date the case was filed.
- Fill in the caption at the top of the form.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- Attach any supporting documents to this form.
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)
Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called "Bankruptcy Rule") 3001(c) and (d).
- Do not attach original documents because attachments may be destroyed after scanning.
- If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.

- A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth. See Bankruptcy Rule 9037.
- For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian. For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <http://restructuring.primeclerk.com/sears>.

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate. 11 U.S.C. § 503.

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (5). A claim may be secured or unsecured.

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☐ have supporting documentation.
(attach below)

☒ do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)? ☐ No ☒ Yes. Check one:

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

	Amount entitled to priority
<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ _____
<input type="checkbox"/> Up to \$2,850* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,850*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input checked="" type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$ _____

* Amounts are subject to adjustment on 4/01/19 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)? ☒ No ☐ Yes. Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Lorraine MAJESKI
Lorraine MAJESKI (May 7, 2019)

Email: lmusworth@aol.com

Signature
Print the name of the person who is completing and signing this claim:
Name of the person who is completing and signing this claim:

Name LORRAINE MARIE MAJESKI
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 424 WESTWOOD AVE
Number Street
LONG BRANCH NJ 07740
City State ZIP Code
Contact phone 732-759-4208 Email LMUSWORTH@AOL.COM,

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☒ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ 9938 Does this amount include interest or other charges?
☒ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or creditcard.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

Past Service Supplemental Benefit

9. Is all or part of the claim secured? ☒ No
☐ Yes. The claim is secured by a lien on property.

Nature of property:

☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.

☐ Motor vehicle

☐ Other. Describe: _____

Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____

Amount of the claim that is secured: \$ _____

Amount of the claim that is unsecured: \$ 9938 (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ 15048.28

Annual Interest Rate (when case was filed) 15%
☒ Fixed
☐ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

Fill in this information to identify the case (Select only one Debtor per claim form):

<input checked="" type="checkbox"/>	Sears Holdings Corporation (18-23538)	<input type="checkbox"/>	Kmart Corporation (18-23549)	<input type="checkbox"/>	Rico, Inc. (18-23561)	<input type="checkbox"/>	MyGofar LLC (18-23573)	<input type="checkbox"/>	Kmart.com LLC (18-23585)
<input type="checkbox"/>	Sears, Roebuck and Co. (18-23537)	<input type="checkbox"/>	MaxServ, Inc. (18-23550)	<input type="checkbox"/>	SYW Relay LLC (18-23562)	<input type="checkbox"/>	Sears Brands Business Unit Corporation (18-23574)	<input type="checkbox"/>	Sears Brands Management Corporation (18-23586)
<input type="checkbox"/>	Kmart Holding Corporation (18-23539)	<input type="checkbox"/>	Private Brands, Ltd. (18-23551)	<input type="checkbox"/>	Wally Labs LLC (18-23563)	<input type="checkbox"/>	Sears Holdings Publishing Company, LLC (18-23575)	<input type="checkbox"/>	SHC Licensed Business LLC (18-23616)
<input type="checkbox"/>	Kmart Operations LLC (18-23540)	<input type="checkbox"/>	Sears Development Co. (18-23552)	<input type="checkbox"/>	Big Beaver of Florida Development, LLC (18-23564)	<input type="checkbox"/>	Kmart of Michigan, Inc. (18-23576)	<input type="checkbox"/>	SHC Promotions LLC (18-23630)
<input type="checkbox"/>	Sears Operations LLC (18-23541)	<input type="checkbox"/>	Sears Holdings Management Corporation (18-23553)	<input type="checkbox"/>	California Builder Appliances, Inc. (18-23565)	<input type="checkbox"/>	SHC Desert Springs, LLC (18-23577)	<input type="checkbox"/>	SRE Holding Corporation (19-22031)
<input type="checkbox"/>	ServiceLive, Inc. (18-23542)	<input type="checkbox"/>	Sears Home & Business Franchises, Inc. (18-23554)	<input type="checkbox"/>	Florida Builder Appliances, Inc. (18-23566)	<input type="checkbox"/>	SOE, Inc. (18-23578)	<input type="checkbox"/>	
<input type="checkbox"/>	A&E Factory Service, LLC (18-23543)	<input type="checkbox"/>	Sears Home Improvement Products, Inc. (18-23555)	<input type="checkbox"/>	KBL Holding Inc. (18-23567)	<input type="checkbox"/>	StarWest, LLC (18-23579)	<input type="checkbox"/>	
<input type="checkbox"/>	A&E Home Delivery, LLC (18-23544)	<input type="checkbox"/>	Sears Insurance Services, L.L.C. (18-23556)	<input type="checkbox"/>	K.L.C., Inc. (18-23568)	<input type="checkbox"/>	STI Merchandising, Inc. (18-23580)	<input type="checkbox"/>	
<input type="checkbox"/>	A&E Lawn & Garden, LLC (18-23545)	<input type="checkbox"/>	Sears Procurement Services, Inc. (18-23557)	<input type="checkbox"/>	Sears Protection Company (Florida), L.L.C. (18-23569)	<input type="checkbox"/>	Troy Coolidge No. 13, LLC (18-23581)	<input type="checkbox"/>	
<input type="checkbox"/>	A&E Signature Service, LLC (18-23546)	<input type="checkbox"/>	Sears Protection Company (18-23558)	<input type="checkbox"/>	Kmart of Washington LLC (18-23570)	<input type="checkbox"/>	BlueLight.com, Inc. (18-23582)	<input type="checkbox"/>	
<input type="checkbox"/>	FBA Holdings Inc. (18-23547)	<input type="checkbox"/>	Sears Protection Company (PR), Inc. (18-23559)	<input type="checkbox"/>	Kmart Stores of Illinois LLC (18-23571)	<input type="checkbox"/>	Sears Brands, L.L.C. (18-23583)	<input type="checkbox"/>	
<input type="checkbox"/>	Innovel Solutions, Inc. (18-23548)	<input type="checkbox"/>	Sears Roebuck Acceptance Corp. (18-23560)	<input type="checkbox"/>	Kmart Stores of Texas LLC (18-23572)	<input type="checkbox"/>	Sears Buying Services, Inc. (18-23584)	<input type="checkbox"/>	

Proof of Claim

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?		Name of the current creditor (the person or entity to be paid for this claim)		Other names the creditor used with the debtor	
2. Has this claim been acquired from someone else?		<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes. From whom?		
3. Where should notices and payments to the creditor be sent?		Where should notices to the creditor be sent?		Where should payments to the creditor be sent? (if different)	
4. Does this claim amend one already filed?		<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes. Claim number on court claims registry (if known)	Filed on MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?		<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes. Who made the earlier filing?		
Contact phone		732-759-4208		Contact phone	
Contact email		LMUSWORTH@AOL.COM		Contact email	

Claim Pursuant to 11 U.S.C. §503(b)(9): A claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business. Attach documentation supporting such claim.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. § 101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

Sears Holdings Corporation Claims Processing Center
c/o Prime Clerk LLC
850 3rd Avenue, Suite 412
Brooklyn, NY 11232

Do not file these instructions with your form

EXHIBIT *A 2*

Lorraine Majeski (Reference number 223 Affected Proof Claim Number 19385;19391 in exhibit A of the Objection)

Phone Conversations regarding the above Case no. 18-23538 Doc 9284

2/16/2021: Outbound call at 2:34 PM to (212) 310 8000 and asked to speak to Dominic A. Litz at Weil, Gotshal & Manges LLP. An inbound call received at 2:39 PM from Mr. Litz. Duration of the call was 6 minutes. During that time, I was told by Mr. Litz, if I was filing an objection, I was to feel free to send it to him for review. If at that time they felt my reason for filing late was valid, they would remove me from the list of creditors that were to be disallowed and therefore would not be required to officially file my objection to the Court.

2/17/2021: Outbound call to Prime Clerk at 2:55 PM and 2:56 PM to 212-257-8000. A call back from 646-710-3918 was received at 3:25 PM. I told the gentleman that I did not receive any notice regarding the Bar Date filing and the claim I did submit on 5/7/2021 was being disallowed for filing after the deadline. He then confirmed I needed to file the Objection as required in Doc 9284. Duration of the call was 9 minutes.

2/19/2021: Outbound call to Prime Clerk at 11:12 AM and 11:14 AM to 212-257-5450. At 11:35 AM I received a call back from 646-710-3918. I asked the caller how the creditors were officially notified regarding the Bar Date Notice and the deadline for filing. He said Sears provided Prime Clerk the list of creditors to be notified by sending a letter via First Class Mail and that they (Prime Clerk) was the sole distributor of the notice. I asked him to check their records to see if they showed evidence that I was mailed a letter by them and if so, what was the postmark date. He confirmed they had no affidavit of service on record as sending me the Bar Date notice letter at first glance but would call me back to confirm 100%. His name was Joshua.

2/19/2021: Inbound call at 5:34 PM from Joshua of Prime Clerk on 646-710-3918. Joshua confirmed there was no affidavit of service on the Bar Date notice mailed to me. He then asked me for the email to Weil, Gotshall & Manges LLC. I asked why and he said they needed to notify the law firm. I told him I did not think that was necessary, but he said it was of his control. He also confirmed it was necessary to formally file with the Court with a CD ROM as I was not an attorney.

2/22/2021. A call was made to Dominic Linz at 8:47 AM to 212-310-8000. I told Dominic that Prime Clerk did not mail me a Bar Notice. He told me that it would take time to confirm that and I did not have to file my objection with the court yet as they would extend my deadline for another two weeks until March 16, 2021. I asked him to email a letter confirming the extension. He did and it is EXHIBIT B. Phone call was 7 minutes in duration. He also said that I could file electronically on the Court website.

EXHIBIT 2

From: "Litz, Dominic" <Dominic.Litz@weil.com>
Date: February 22, 2021 at 8:55:03 AM EST
To: "lmusworth@aol.com" <lmusworth@aol.com>
Subject: **Sears - Objection Deadline Extension**

Lorraine,

As discussed today on the phone, the Debtors' are extending the objection deadline by 2-weeks to March 16, 2020 at 4:00 p.m.

Regards,
Dominic



Dominic A. Litz

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
dominic.litz@weil.com
+1 212 310 8346 Direct
+1 917 756 0378 Mobile

THE DEBTORS' TWENTY-THIRD OMNIBUS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE OMNIBUS OBJECTION TO DETERMINE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION, AND/OR THE EXHIBIT ATTACHED THERETO, TO DETERMINE WHETHER THE OBJECTION AFFECTS THEIR CLAIM(S).

**IF YOU HAVE QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL
DOMINIC A. LITZ, ESQ. AT (212) 310-8000**

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Ray C. Schrock, P.C.
Jacqueline Marcus
Garrett A. Fail
Sunny Singh

*Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re

Chapter 11

SEARS HOLDINGS CORPORATION, et al.,

Case No. 18-23538 (RDD)

Debtors.¹
-----X

(Jointly Administered)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors' corporate headquarters is 1700 Broadway, 19th Floor, New York, New York 10019.

**NOTICE OF HEARING ON DEBTORS' TWENTY-THIRD
OMNIBUS OBJECTION TO PROOFS OF CLAIM (NO LIABILITY CLAIMS)**

PLEASE TAKE NOTICE that, on February 9, 2021, Sears Holdings Corporation and certain of its affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) filed the *Debtors' Twenty-Third Omnibus Objection to Proofs of Claim (No Liability Claims)* (the “**Objection**”) with the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that the Objection requests that the Bankruptcy Court disallow and expunge one or more proofs of claim (the “**Proofs of Claim**”) listed on **Exhibit A** annexed hereto on the ground(s) that the Debtors have no liability under such Proof of Claim because such Proof of Claim either: (i) states no basis for the asserted claim, (ii) Debtors books and records do not support asserted claim, or (iii) the Proof of Claim was filed after the applicable date set forth in the *Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto*, entered on February 22, 2019 (ECF No. 2676) (the “**Bar Date Order**”).

**ANY CLAIM THAT THE BANKRUPTCY COURT
EXPUNGES AND DISALLOWS WILL BE TREATED AS IF
IT HAD NOT BEEN FILED AND YOU WILL NOT BE
ENTITLED TO ANY DISTRIBUTION ON ACCOUNT
THEREOF.**

PLEASE TAKE FURTHER NOTICE that the *Court-Ordered Claims Hearing Procedures* (the “**Claims Hearing Procedures**”), annexed hereto as **Exhibit B**, shall apply and govern the Objection to the Claims. The Claims Hearing Procedures provide for certain mandatory actions by claimants (each, a “**Claimant**” and collectively, the “**Claimants**”) within certain time periods. Therefore, please review the Claims Hearing Procedures carefully. Failure to comply with the Claims Hearing Procedures may result in the disallowance and expungement of a Proof of Claim without further notice to the respective Claimant(s).

PLEASE TAKE FURTHER NOTICE that, if Claimant does NOT oppose the disallowance and expungement of its applicable Claim(s), as listed on **Exhibit A** annexed hereto, then Claimant does NOT need to file a written response (the “**Response**”) to the Objection and Claimant does NOT need to appear at the Hearing (as defined herein).

PLEASE TAKE FURTHER NOTICE that, if Claimant DOES oppose the disallowance and expungement of its applicable Claim(s), as listed on **Exhibit A** annexed hereto, then Claimant MUST file with the Bankruptcy Court and serve on the parties listed below a Response to the Objection, so as to be filed and received by no later than **March 2, 2021, at 4:00 p.m. (Prevailing Eastern Time)** (the “**Response Deadline**”).

PLEASE TAKE FURTHER NOTICE that Response(s) to the Objection, if any, must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, and shall be filed with the Bankruptcy Court (i) by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (ii) by all other parties-in-interest, on a CD-ROM, in text-searchable

portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-395; to the extent applicable, and shall be served in accordance with the *Amended Order Implementing Certain Notice and Case Management Procedures*, entered on November 1, 2018 (ECF No. 405) (the “**Amended Case Management Order**”), so as to be filed with the Bankruptcy Court and received by the parties listed below by or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that Response(s) to the Objection, if any, must contain, at a minimum, the following: (i) a caption setting forth the name of the Bankruptcy Court, the names of the Debtors, the case number and the title of the Objection to which the Response is directed; (ii) the name of the Claimant and description of the basis for the amount of the Claim; (iii) a concise statement setting forth the reasons why the Claim should not be disallowed and expunged for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which Claimant will rely in opposing the Objection; (iv) all documentation or other evidence of the Claim, to the extent not included with the Proof of Claim previously filed with the Bankruptcy Court, upon which Claimant will rely in opposing the Objection; (v) the address(es) to which the Debtors must return any reply to Claimant’s Response, if different from that presented in the applicable Proof of Claim; and (vi) the name, address, and telephone number of the person (which may be Claimant or Claimant’s designated legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on Claimant’s behalf.

**CLAIMANTS SHOULD NOT CONTACT THE CLERK OF
THE BANKRUPTCY COURT TO DISCUSS THE MERITS
OF THEIR CLAIMS.**

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court will consider a Response only if the Response is timely filed, served, and received in accordance with the *Amended Case Management Order* and the procedures set forth herein. A Response will be deemed timely filed, served, and received only if the original Response is actually received on or before the Response Deadline by (i) the chambers of the Honorable Robert D. Drain, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601; (ii) Weil, Gotshal, & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Ray C. Schrock, Esq., Jacqueline Marcus, Esq., Garrett A. Fail, Esq., and Sunny Singh, Esq.), attorneys for the Debtors; and (iii) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, New York 10036 (Attn: Philip C. Dublin, Esq., Ira Dizengoff, Esq., and Sara Lynne Brauner, Esq.), attorneys for the Official Committee of Unsecured Creditors appointed in these cases.

PLEASE TAKE FURTHER NOTICE that, except as otherwise permitted under the Claims Hearing Procedures, a hearing to consider the Objection will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, on **March 23, 2021 at 10:00 a.m. (Prevailing Eastern Time)** (the “**Hearing**”). If Claimant files a Response to the Objection, Claimant should plan to appear at the Hearing. The Debtors, however, reserve the right to continue the Hearing on the Objection with respect to the Claim(s) that are the subject of such Response. If the Debtors do continue the Hearing with respect to such Claim(s), then the Hearing on the Objection with respect to such Claim(s) will be held at a later date. If the Debtors do not continue the Hearing with respect to such Claim(s), then a Hearing on the Objection will be conducted on the above date.

PLEASE TAKE FURTHER NOTICE that if Claimant does not timely file and serve a Response to the Objection, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed as **Exhibit B** to the Objection, which order may be entered without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that, if the Bankruptcy Court does NOT disallow and expunge the Proofs of Claim subject to the Objection, the Debtors retain the right to object on other grounds to the Proofs of Claim(s) (or to any other Claim(s) Claimant may have filed) at a later date. Claimant will receive a separate notice of any such objection(s).

PLEASE TAKE FURTHER NOTICE that Claimant may participate in the Hearing telephonically, provided Claimant complies with the Bankruptcy Court's instructions (including, without limitation, providing prior written notice to counsel for the Debtors and any statutory committee), which can be found on the Bankruptcy Court's website at www.nysb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that any responding parties are required to attend the Hearing, and failure to appear may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that, if any Claimant wishes to view the complete Objection, such Claimant can do so for free at <https://restructuring.primeclerk.com/sears>.

Dated: February 9, 2021
New York, New York

/s/ Garrett A. Fail

Ray C. Schrock, P.C.

Jacqueline Marcus

Garrett A. Fail

Sunny Singh

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

*Attorneys for Debtors
and Debtors in Possession*

Exhibit A

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
1.	ACEVEDO, DANIEL J	17102	\$2,345.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
2.	Adam, Evanne	19421*	\$1,557.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
3.	Adams, Benji L.	3054; 4256	\$11,671.90	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
4.	ADAMS, CASSANDRA	13428	\$15.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
5.	Adger, Jessica E	9018	\$20,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
6.	Aetna Life Insurance Company	16679	\$38,041.88	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
7.	Aikins, Scott Richard	7099	\$1,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
8.	Ainsworth, Julie	4676	\$400,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
9.	Alberigi, Richard	15902	\$70,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
10.	Allen, Willie G	17130	\$1,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
11.	AMBRIZ, MARIO	13069; 14415	\$3,069.24	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
12.	Anamier, Kimberlee	8968	\$408.80	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
13.	ARCURI, ANTHONY J	14465	\$840.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
14.	ARMENTA, AMPARO	18630*	\$8,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)

Debtors' Twenty-Third Omnibus Objection to Claims
 Exhibit 1 - Disallowed Claims

In re: Sears Holdings Corporation, et al.
 Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed				
Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
15.	AUNCHMAN, PATRICIA A	9609	\$10.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
16.	AUSTIN, GERDA	10873	\$2,572.50	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
17.	AVINGER, VICKIE	10321	\$3,900.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
18.	AZIZPOUR, JANSOUN	13250	\$4,119.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
19.	BACA, HAZEL M	18777*	\$1,116.80	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
20.	BACHMAN, JAMES	5817	\$5,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
21.	BAKER, DEBRA	11094	\$10,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
22.	BALLOU, STACEY R	8978	\$2,505.48	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
23.	Banks III, James Edward	8612; 8680	\$35,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
24.	Bannerman, Mary	19022*	\$726.96	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
25.	Barajas, Rosa	19397*	\$530.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
26.	Barajas, Rosa	4982	\$530.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
27.	Barnes, Horace	6795; 8062; 10525; 10670	\$28,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
28.	BASNYAT, LAXMI	11799	\$1,409.51	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
29.	Bass, Christopher	19816*	\$6,800.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
30.	BATES, ROBERT L	18842*	\$10,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
31.	Battaglia, Mario	19340*	\$13,807.56	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
32.	Battaglia, Mario	3734	\$13,807.56	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
33.	BAUMAN, ALEXANDER G	5543	\$450.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
34.	BAXTER, ERIN K	18920*	\$1,512.73	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
35.	BEATRIZ-GARCIA, MIGUELINA	19297*	\$4,400.11	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
36.	Bell, Andrew	14171	\$4,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
37.	BOHONOK, ELIZAVETA	19429*	\$800.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
38.	BOLIN, RICHARD N	13490	\$647.59	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
39.	BONDI, MICHAEL	18622*	\$8,320.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
40.	BOWMAN, PETER	11087	\$26,923.07	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
41.	BRADFORD, ROZALYNN	4382; 9451	\$12,900.83	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
42.	Brandon, Cindy	1496; 1735; 13390	\$58,368.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
43.	BRANNAN, CALVIN	18856*	\$296.06	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
44.	BROACH, KRISTIN D	13052	\$1,700.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
45.	BROOKS, KHAMARI	15055	\$500.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
46.	BROOKS, MICHELLE L	18344*	\$2,264.80	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
47.	BROWN, DELMA L	23081*	\$5,860.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
48.	BROWN, RODNEY	17225	\$55.13	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
49.	Bruder, Kelly	19066*	\$461.53	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
50.	BUCKNER, LATONYA Y	18435; 18463*	\$1,208.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
51.	Bueltel, Arlean Zimmerman	21617*	\$13,600.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
52.	BUNCH, VICKIE T	13967	\$27.91	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
53.	BURKS, ARIEL	18971*	\$4,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
54.	Bush Jr, Kenneth R.	9784	\$74,493.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
55.	BUSHWAY, BERNICE	15298	\$15,610.89	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
56.	BUTTS, DOMINIQUE	9140	\$1,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
57.	BYNUM, ROSELLA	17872	\$6,400.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
58.	Cadena, Angelica M.	1743; 2051	\$644.17	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
59.	Caetta, Wendi	6896	\$41.47	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
60.	Cagle, Kathy E	3826	\$5,681.20	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
61.	Calo, Yara	9963	\$944.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
62.	CARBAJAL, ANTONIO	5883	\$32,307.69	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
63.	CARGILE, BETTY L	11817	\$5,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
64.	Carranza, Monica	12856	\$1,935.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
65.	Carter, Daniel Lee	22710*	\$12,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
66.	Castaneda, Nadine	1850; 12757; 17669	\$26,153.85	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
67.	CAULEY, MERCYDE L	10331	\$2,500.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
68.	CAVANAUGH, BRIAN D	11651	\$2,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
69.	CERVANTES, MITCHELL	19514*	\$10,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
70.	Chahoud, Diala	5698	\$414.90	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed				
Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
71.	Challagulla, Nanaji	10375	\$4,678.90	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
72.	CHAMBERS, MICHAEL C	13123	\$4,008.80	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
73.	Cobos, Delilah N	11146	\$140.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
74.	COLE, TAMI	9899	\$36.95	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
75.	Collins, Kennille	19104*	\$500.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
76.	Colon, Carlos	13314	\$5,478.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
77.	CONDES, SALLY	18331*	\$55,680.24	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
78.	Conley, Kimberly E	20314*	\$8,838.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
79.	CONTRERAS, ASael	14385	\$2,200.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
80.	Cook, Loretta Lynn	6174	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
81.	COSTELLO, NICHOLAS A	16618	\$235.19	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
82.	Coupons and Freebies Mom, LLC	12727	\$614.02	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
83.	COURCHAINE CYNTHIA L	10344	\$5,192.31	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
84.	Covalenco, Anastasia S.	7491	\$639.58	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
85.	CRAWFORD, LISA	10791	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
86.	CRIVELLO, MARY E	11612	\$466.01	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
87.	CROWDER, DIANNE	11113	\$6,556.46	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
88.	D'AMBROSIO, MICHAEL	10398	\$2,520.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
89.	DARBIN, CODY D	19403*	\$4,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
90.	DAVIDOFF, SAYMON	16830	\$3,294.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
91.	Davis' White, Ethel	6725; 10778	\$19,589.08	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
92.	DAVIS, ELVIN	26242*	\$12,850.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
93.	Dawe, Kelly L	20025*	\$1,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
94.	Del Angel, Justina	3563; 16069; 16492	\$3,833.33	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
95.	Delgado, Maria	19450*	\$500.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
96.	Delgado, Maritza	14331	\$2,121.60	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
97.	DEWHIRST, CLAUDIA L	12434	\$119,191.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
98.	DIETZ, DORA M	11926	\$5,408.54	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
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Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
99.	D'ONOFRIO, FRED E	18603*	\$8,296.86	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
100.	Dorvil, Henry	10186	\$5,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
101.	DOUMGOUM, SARA L	17152	\$12,495.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
102.	DUGINSKI, KAREN	15410	\$8,165.18	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
103.	DUKES, BRINTLEY N	6003	\$200.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
104.	Dumbrys, Sabrina	4949	\$4,172.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
105.	DUNBAR, BETH	11948	\$3,307.50	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
106.	DYE, ANNETTE Y	17574	\$5,750.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
107.	Ebeling, Dallas	19870*	\$5,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
108.	Edwards, Chaquita	18616*	\$12,850.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
109.	Emery, Cameron	2463	\$9,831.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
110.	Esquivel, Ramon	9362	\$5,760.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
111.	ESSAVI, ROBERT	13152	\$1,345.80	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
112.	ESTEP, TERRI L	6178	\$4,720.80	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
113.	EUKERS, TIMOTHY P	18961*	\$14,582.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
114.	Ferrier, Hugh D	24207*	\$10,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
115.	FILIPAK, STEVEN	11019	\$177.26	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
116.	Fisher, Ronald	15882	\$1,900.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
117.	Foster, Tammy	18789*	\$1,211.55	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
118.	FRACASSO, JESSICA L	13776	\$1,500.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
119.	FREEMAN, TAMITHIA	14962	\$16,993.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
120.	Friedericks, Tiffany	18995*	\$2,100.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
121.	FULLER , SUSAN K	10589	\$4,508.43	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
122.	FUNNELL, GEORGE A.	21669*	\$7,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
123.	GARCIA GARCIA, PEDRO PABLO	5683	\$102.85	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
124.	Garcia, A.I.	15916	\$6,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
125.	Garcia, Angelica J	5062	\$4,200.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
126.	GARCIA, BRENDA	16081	\$1,571.02	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
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Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
127.	GARCIA, LOUIS D	17846*	\$1,400.19	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
128.	GARCIA, LUZANN M	9597	\$141,759.60	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
129.	GARCIA, MARTIN	20345*	\$5,950.85	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
130.	GARCIA, NATALIE GARCIA	5696	\$314.97	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
131.	GARTH, MISHA	14279	\$9,397.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
132.	GARZON, GLADYS	15522	\$800.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
133.	GOLCHINZADEH, PAMCHAL	19451*	\$10,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
134.	Gonzalez, Hector L.	6906	\$5,690.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
135.	Grant Jr, Tyrone L.	16913	\$1,214.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
136.	GRAY SUSAN M	1422; 9025	\$4,310.56	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
137.	GREESON, JILLIAN J	15629	\$1,132.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
138.	GREGORY, MARCUS	15943; 16283; 16592; 17175; 17737	\$22,500.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
139.	Gresham, Nancy	18485*	\$295.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
140.	Griffin, Markita	16733	\$2,400.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
141.	Groves, Shedaysa	9183; 9202	\$2,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
142.	GUBERSKI, MICHAEL	18225*	\$5,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
143.	Gugig, Joan	5705	\$865.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
144.	GUILLEN, JAVIER	19836*	\$7,650.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
145.	Gutman, Lisa	1938	\$584.43	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
146.	GUZMAN, ALEXANDRA	10146	\$408.10	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
147.	GWARGGIS, REMON N	17280	\$3,640.58	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
148.	Hamm Jr, Gerald	5746	\$6,294.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
149.	HAMM, GERALD W	19927*	\$18,883.20	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
150.	HANDSFORD, TAMARIA S	19129*	\$100,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
151.	Harris, Domminic D	9212	\$700.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
152.	HARVEY, DOMONIQUE	19522*	\$5,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
153.	HASSELBERGER, LYNN ANNE	4952	\$2,692.31	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
154.	HERMAN, STEPHANIE K	14919	\$1,211.55	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
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Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
155.	HILL, JOHN M	25822*	\$17,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
156.	Hinckley, Colette R.	6295	\$3,360.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
157.	HO, CHI	5773	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
158.	Hoeller, William Irvin	26273*	\$475,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
159.	Hoeller, William Irvin	5101	\$475,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
160.	HOSKING, ROBERT JR.	13623	\$4,489.49	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
161.	Hough, Kyle J.	17121*	\$1,425.60	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
162.	HOWARD, NASHIRA N	14856	\$12,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
163.	HOWARD, ROOSEVELT	12106; 12802; 13989	\$1,520.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
164.	ISLAM, SERAJUL	17297	\$4,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
165.	JACKSON, ANTHONY	17703; 18492*	\$1,131.78	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
166.	JACKSON, WENDY	10739	\$20,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
167.	Jacobi, Eric	4369	\$280.94	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
168.	Jancik, Jessica	623	\$7,933.76	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

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Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
169.	JEFFERS, ROBERT E	13244	\$724.62	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
170.	JENKINS, CURTISTINE	11409	\$9,525.84	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
171.	Johnson, Alexander	11107	\$72.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
172.	Johnson, Damian	12664	\$1,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
173.	Johnson, Karen	19420*	\$15,700.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
174.	JOHNSON, PATRICIA A	7987; 13126	\$6,486.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
175.	JOHNSON, RUSSEL	9602	\$1,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
176.	JOHNSON, TUSSHANNON	18863*	\$12,850.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
177.	Jones, David R.	7571	\$24,125.83	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
178.	Jones, Deanna J	9512	\$200.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
179.	JONES, DEJUANA	12273	\$450.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
180.	Jones, Joseph	12721	\$20,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
181.	Jones, Kenya	11040	\$450.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
182.	Jones, Michael A	18913*	\$6,351.98	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)

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Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
183.	Jones, Michael A	9175	\$6,351.98	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
184.	JONES, SAM	9660	\$2,830.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
185.	Joshi, Manjiri	6289; 9560	\$27,500.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
186.	KALWASINSKI, DONNA E	5173	\$4,654.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
187.	KEITH, DEBRA K	18497*	\$744.59	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
188.	Kemp, Susanne	6696	\$3,640.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
189.	KEYMCKELVY, VERONICA	15486	\$10,961.54	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
190.	KIJEK, CYNTHIA	12307	\$4,075.18	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
191.	Kilgore, James	19206*	\$437.50	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
192.	King, James	12320	\$38,616.48	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
193.	KITCHEN, CONSTANCE	17900	\$1,737.22	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
194.	KITCHENS, ANTHONY	9928	\$37,667.98	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
195.	KLIMCAK DAVID	15026	\$2,113.06	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
196.	Knight, Joseph C.	1821; 9760	\$13,269.23	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

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Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
197.	KOLAR, SPRESA	17920	\$15,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
198.	KRONES, JOHN L.	17103	\$7,100.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
199.	KRUSZEWSKI, FRANK M	1531; 1942; 3995; 4452; 11770	\$477,370.70	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
200.	Krynock, Michael G	15470	\$1,572.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
201.	Kuturu, Sampath	6826	\$3,622.37	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
202.	LANE, CHRISTINA M.	12823	\$1,500.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
203.	Lane, Debra S	10767	\$87.66	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
204.	Lang, Caroln M	6761	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
205.	LAPINSKI, PATRICIA A	18493*	\$3,712.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
206.	LARACUENTE, EDITH	17681*	\$50,612.20	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
207.	Larsen, Deborah A	6224	\$18,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
208.	LaRue, Michael	4359	\$6,041.67	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
209.	LE, CUONG	19903*	\$2,750.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
210.	Lebaron, Beau Brady	24733; 24734*	\$141,231.46	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed				
Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
211.	LEO, PERO	17767	\$1,646.75	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
212.	Limas, Adam	16453	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
213.	LINDSAY, NEIL J	19121*	\$1,743.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
214.	Linguist, Marshall G.	9701	\$56,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
215.	LOCKETT, LAKETISHA	18481*	\$9,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
216.	LOPEZ, JESSE	7114	\$2,250.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
217.	Lovato, Barbara M	15326	\$2,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
218.	LOVE, ROBERT E	18316*	\$20,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
219.	Lugo, Roxana	6157; 9762; 10984	\$5,096.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
220.	Lyncu, Dawn	1518; 1981	\$497.69	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
221.	M.P.O., a minor child (Brenda Perez, parent 604 W Grove St., Rialto, CA)	18186	\$3,059.38	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
222.	MAD, JERRY N	12349	\$6,720.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
223.	Majeski, Lorraine	19385; 19391*	\$19,876.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
224.	Mangia-Cummings, Suzzann	6732	\$12,538.46	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
225.	MANTHEY, AMBER DAWN	19597; 19600; 19607*	\$29,269.57	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
226.	MARDAN SERVICES GROUP	5619	\$825.24	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
227.	MARTINEZ, BERTHA E	19496*	\$1,668.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
228.	Massie-Rawls, Aaron Jerome	19282*	\$3,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
229.	MAYS, RHONDA	10051	\$120.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
230.	MCDANIELS, PAMELA N	14500; 15454	\$3,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
231.	McLaughlin, Molly	9356	\$77.79	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
232.	MCLEOD, CONNIE	5843	\$20,384.62	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
233.	MENDOZA, MARILOU	18355*	\$1,400.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
234.	Mendrala, Lee	2199	\$2,625.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
235.	MEZZO JR, WILLIAM S	18702*	\$30,553.60	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
236.	MIJARES, DAVID	19338*	\$101.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
237.	MORAN, KAREN L	19082*	\$2,056.25	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
238.	Morgan, Nancy	5508	\$884.62	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
239.	MORRISON, ROXYLEN	17195	\$9,800.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
240.	MOSLEY, ROBERT C	18154*	\$21,690.60	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
241.	MUEHLING, WILLIAM D	5396	\$19,615.39	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
242.	Myers, Chris D.	4828	\$8,009.60	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
243.	MYRICK, CHRISTOPHER L	10576	\$1,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
244.	NAATZ, NANCY J	5852; 11399	\$24,115.38	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
245.	Naedele Jr., Robert J.	15770; 15840	\$461,158.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
246.	Narvaez, Erica A	734	\$590.22	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
247.	NELSON, LUEANN	11194	\$2,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
248.	NOKES, CINDY	19029*	\$1,438.38	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
249.	Nzolameso, Francisca	15226	\$3,010.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
250.	O'Brien, Margaret S.	25138*	\$5,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
251.	OCARIZ, CARMEN	17139	\$17,408.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
252.	OLDHAM, SONJA	17771	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
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Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
253.	Oltarzewski, Frank	4765	\$1,505.59	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
254.	O'Neill, Joanne	9927	\$12,422.11	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
255.	OTERO, YELENA	6158; 10334	\$2,940.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
256.	Owen III, John William	20318*	\$250.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
257.	PAEK, JOOHEE	12053	\$20,724.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
258.	Partridge, Brenda	9652	\$16,215.70	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
259.	PATEL, DIVYA	4729	\$5,955.60	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
260.	PATTERSON, MIKE R	18553*	\$2,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
261.	PAULSON, VALERIE	15090	\$10,454.56	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
262.	PAYTON, GEORGE W	17358*	\$2,931.60	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
263.	PEREZ, MARGARITA L	15676	\$5,740.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
264.	Perry, Robert	6228	\$5,940.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
265.	Phillip-Harris, Kyla	13011	\$764.65	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
266.	PHILLIPS, BRENDA L	18806*	\$10,500.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
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Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
267.	PIERCE, DEBRA	18457	\$3,190.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
268.	PIKINI, JORENE	18819*	\$941.50	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
269.	Piotrowski, Mark	1114	\$13,846.15	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
270.	PIZZINO, JENNY L	9444	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
271.	Poniatowski, Donna	4778; 9915	\$3,953.38	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
272.	Preston, Sandra L	6065	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
273.	PREUDHOMME, WENDY A	15567	\$7,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
274.	Pudlak, Natalia L	10068	\$2,500.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
275.	PURIFOY-COWANS, KEIVIA	11139	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
276.	PUSATERI, SANDI M	6967	\$4,667.77	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
277.	Randall, Teresa A	2309	\$2,208.33	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
278.	RAUSCH, PAUL T	19210*	\$1,103.20	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
279.	REED, ANGELA S	14060; 18207	\$3,902.50	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
280.	REEVES, MARK	5845; 11156	\$2,724.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
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Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
281.	RENDON, TERRY	10963	\$13,250.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
282.	Renfrew, Nora	17267	\$4,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
283.	Richard C Slowikowski	10330	\$10,036.75	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
284.	RIGSBY, ZOI	5460; 12145	\$7,017.59	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
285.	RIVERA, HELGA	17254	\$205.84	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
286.	ROBERTS, CLAUDIA A	19045*	\$1,370.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
287.	ROBERTS, MALESHA	14289	\$4,400.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
288.	ROBINSON, JERRY L	19101*	\$10,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
289.	Robinson, Tenisha C	18700*	\$350.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
290.	Romanchuk, Cheryl L.	2419; 5662; 13068	\$44,221.10	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
291.	Rose, Charles Thomas	8834	\$9,082.19	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
292.	RUCKSTEIN, PETER W	19612*	\$913.47	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
293.	Salazar, Sonia	17436	\$2,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
294.	Salvaji, Srilatha	15003	\$16,333.33	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
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Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
295.	SAMPSON, JULIE	18561*	\$12,850.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
296.	SAMS, AQUILLA J	11903	\$7,200.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
297.	SCHWEIGERT, TAMMY	13500	\$5,760.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
298.	Schwer, Andrea	5479	\$3,269.60	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
299.	SELLERS, BONNIE JEAN	14426	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
300.	SHAIKH, MUHAMMAD M	4596	\$4,258.80	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
301.	SHALITA, WILSON D	13537	\$3,262.77	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
302.	Shepard, Jacqueline Renee	1848	\$7,298.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
303.	SHOMO, CHARLES H	19264*	\$1,221.92	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
304.	SHONGO, RACHEL M	9654	\$2,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
305.	SHRIVATSA, SHWETHA	13572	\$3,984.62	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
306.	Shrock, Cynthia C.	4756; 13381	\$2,660.66	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
307.	SILVA, VICTOR M	6116	\$20,730.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
308.	SMITH, DWIGHT B	19021*	\$1,901.28	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)

Debtors' Twenty-Third Omnibus Objection to Claims
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Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
309.	Smith, James Edmond	19509*	\$2,490,344,585.69	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
310.	Smith, James Edmond	8092	\$2,490,344,585.69	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
311.	Smith, James Edmond	13404	\$2,490,344,585.69	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
312.	SMITH, JR., CHALRES G	5079	\$131,250.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
313.	Smith, William	9332	\$1,969.58	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
314.	SMITH, WYATT W	13160	\$414.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
315.	SNITGEN, DEBORAH LYNN	5693	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
316.	Snow, Samuel Oliver	2293; 11180	\$21,153.84	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
317.	SOLANO HAY, REBECCA	14513	\$1,431.09	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
318.	SPRAYBERRY, DEBORAH C	16917	\$1,907.52	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
319.	Stallworth, Sabrina	19884*	\$15,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
320.	STANGO, THERESA	12936	\$9,800.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
321.	STEPHEN, RAY C	13175	\$3,603.20	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
322.	STEVENS, RONALD	10702	\$8,432.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

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Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
323.	STEWART, PATRICIA	14117	\$30,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
324.	STOUT, RICHARD	16704	\$2,718.80	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
325.	Tana Thomas as Personal Representative of the estate of Genet Thomas	13917	\$2,665.60	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
326.	Taylor, Cory	20317*	\$500.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
327.	Teamsters Local Union No. 705	10194	-	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
328.	THAKKAR, PUJA	16723	\$95,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
329.	Tomillo, Anthony	2431; 9715	\$3,018.65	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
330.	Torres Caraballo, Jesus Manuel	4971	\$6,821.81	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
331.	TORRES, PASCUAL	18786*	\$21,000.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
332.	Tran, Vi	2651; 4193	\$79,344.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
333.	TRUJILLO SUSANNE R	15767	\$3,069.34	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
334.	Truong, Brandon	699; 9608	\$54,800.70	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
335.	UMEK, ABIGAIL	18281*	\$480.05	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
336.	UNDERWOOD, MARK	2007; 9311; 9632	\$49,341.41	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
337.	Vail, Kathy J.	3122; 18146	\$5,984.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
338.	Vas, Ruby B	5114; 9450	\$6,683.04	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
339.	Veal, Laura	8121; 17049	\$2,942.40	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
340.	VEAL, ZETHELDA	13637	\$2,721.60	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
341.	VILLANUEVA, DIMITRI F	10806	\$1,076.92	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
342.	WAARDENBURG, JAMIE	10831	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
343.	WALKER, JUSTIN JOHN	12797	\$3,018.65	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
344.	WALLACE, ANNETTE M	9637	\$66,787.45	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
345.	WANYONYI, KUNNY EILEEN KASE	12319	\$2,012.50	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
346.	WARD, AIKIA LISA	1464; 3401; 16316	\$16,320.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
347.	WARD, LAWRENCE O.	18157	\$34,820.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
348.	Wasiur Rahman, Fnu	1215	\$1,978.17	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
349.	WATSON, LARRY E	18273*	\$981.70	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
350.	WEH, ALFREDA G	12880	\$1,946.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed

Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
351.	Weiss, Michael Gregory	9996	\$2,812.50	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
352.	Wenig, Michael J.	20022*	\$12,850.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
353.	WHITE, YVONNE	14540	\$5,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
354.	WILDER, THOMAS	18953*	\$540.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
355.	WILLIAMS JR, KEVIN ANTHONY	5990	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
356.	Williams, Carol	6595	\$6,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
357.	Williams, Majorie M	3706	\$2,720.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
358.	WILSON, JARELL B	19763*	\$130.55	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
359.	WILSON, JOHN O.	12874	\$12,850.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
360.	WILSON, SHELIA	6968	\$98.96	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
361.	WILSON, STEPHEN J	10536	\$146,720.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
362.	WITHERSPOON, TIFFANY JANELLE	19829*	\$500.00	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
363.	Wojdyla-Landrum, Kathleen	4267; 12013	\$39,398.48	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
364.	WOJTECKI, PAULETTE	13146	\$1,811.19	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

Debtors' Twenty-Third Omnibus Objection to Claims
Exhibit 1 - Disallowed ClaimsIn re: Sears Holdings Corporation, et al.
Case No. 18-23538 (RDD)

Schedule of Claims to be Expunged & Disallowed				
Ref #	Name of Claimant	Affected Proof of Claim No.	Total Asserted Claim Amount	Reason for Proposed Disallowance
365.	Woods Evans, Victoria	5930	\$5,000.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
366.	WOOTEN, REGINA	11781	\$3,840.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
367.	WOZNIAK, RICHARD K	12362	\$2,414.92	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
368.	Young, LeVorn	16650; 16705	\$3,828.24	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
369.	Zhang, Jiyu	2619	\$4,769.23	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
370.	Zink, Margaret	4832; 5245	\$20,674.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim
371.	ZIRLOTT, TERRI L	18772*	\$1,772.16	The Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676)
372.	ZULETA, MAYRA	9063; 9109	\$1,800.00	The asserted claim is not supported by the Debtors' books and records or no supporting documents were provided for all or a portion of the claim

* The Disputed Claim was filed after the applicable date set forth in the Order Establishing Deadline to File Proofs of Claim and Procedures Relating Thereto, entered on February 22, 2019 (ECF No. 2676) (the "Bar Date Order")

Exhibit B

Claims Hearing Procedures

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	: Case No. 18-23538 (RDD)
Debtors. ¹	: (Jointly Administered)
-----X	

COURT-ORDERED CLAIMS HEARING PROCEDURES

The claims hearing procedures (the “**Claims Hearing Procedures**”) described herein have been ordered by the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) to apply to the Chapter 11 cases of the Sears Holdings Corporation and its affiliated debtors (collectively, the “**Debtors**”).

Claims Hearing Procedures

1. Pursuant to the *Amended Order Implementing Certain Notice and Case Management Procedures*, entered on November 1, 2018 (ECF No. 405) (the “**Amended Case Management Order**”), the Bankruptcy Court established periodic omnibus hearings (the “**Omnibus Hearings**”) in these Chapter 11 cases. The Debtors shall schedule the return date for claims objections, omnibus or otherwise, for hearing at Omnibus Hearings or other hearings the Debtors may schedule with the Bankruptcy Court.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brands Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation. The location of the Debtors’ corporate headquarters is 1700 Broadway, 19th Floor, New York, New York 10019.

2. The Bankruptcy Court may enter an order at the scheduled hearing sustaining an objection to proofs of claim (each, a “**Proof of Claim**”) with respect to which no response (a “**Response**”)² is properly filed and served.
3. The hearing to consider an objection to Proofs of Claim as to which a Response is properly filed and served (each, a “**Contested Claim**”) shall be set for a contested hearing (each, a “**Claims Hearing**”) to be scheduled by the Debtors, in their sole discretion, as set forth herein. The Debtors may request that the Bankruptcy Court schedule Claims Hearings on the date and/or time of the Omnibus Hearings or at another date and time.
4. The Debtors shall schedule a Claims Hearing for a Contested Claim as follows:
 - (i) For a non-evidentiary hearing to address whether the Contested Claim has failed to state a claim against the Debtors which can be allowed and should be dismissed pursuant to Bankruptcy Rule 7012 (a “**Sufficiency Hearing**”), unless the Debtors serve the applicable claimant (the “**Claimant**”) with a Notice of Merits Hearing (as defined herein), the Sufficiency Hearing shall go forward at the return date set in accordance with paragraph 1 of these Claims Hearing Procedures. The legal standard of review that will be applied by the Bankruptcy Court at a Sufficiency Hearing will be equivalent to the standard applied by the Bankruptcy Court upon a motion to dismiss for failure to state a claim upon which relief can be granted.
 - (ii) For an evidentiary hearing on the merits of a Contested Claim (a “**Merits Hearing**”), the Debtors may, in their sole discretion, serve upon the relevant Claimant, by email or overnight delivery, with a copy to the Creditors’ Committee, and file with the Bankruptcy Court, a notice substantially in the form attached to the *Order Approving (I) Claims Objection Procedures, (II) Claims Settlement Procedures, and (III) Claims Hearing Procedures* (ECF No. 3014) as **Exhibit 2** (a “**Notice of Merits Hearing**”) at least thirty (30) calendar days prior to the date of such Merits Hearing. The rules and procedures applicable to such Merits Hearing will be set forth in any scheduling order issued by the Bankruptcy Court in connection therewith.
5. Discovery with respect to a Contested Claim will not be permitted until either: (i) the Bankruptcy Court has held a Sufficiency Hearing and determined that the Contested Claim states a claim that could be allowed and should not be dismissed pursuant to Bankruptcy Rule 7012; or (ii) the Debtors have served on the relevant Claimant a Notice of Merits Hearing with respect to the Contested Claim.
6. The Debtors may file and serve a reply (a “**Reply**”) to a Response no later than 4:00 p.m. (Prevailing Eastern Time) on the day that is at least two (2) business days prior to the date of the applicable hearing.
7. The Debtors, in their sole discretion, are authorized to further adjourn a hearing scheduled in accordance herewith at any time by providing notice to the Bankruptcy Court and the Claimant.

² Any information submitted in connection with a Proof of Claim shall be part of the record with respect to the relevant Claim, and any such information already submitted need not be resubmitted in connection with the Claims Hearing Procedures.

8. **Sanctions.** The Bankruptcy Court will consider appropriate sanctions, including allowance or disallowance of the Contested Claim, if either party does not follow the Claims Hearing Procedures.

BY ORDER OF THE BANKRUPTCY COURT